



Arizona Corporation Commission

DOCKETED

JUN 09 2015

DOCKETED BY

2015 JUN -9 P 4: 10

Docket No. E-01933A-15-0100

Arizona Corporation Commission:

AZ CORP COMMISSION
DOCKET CONTROL

ORIGINAL

On behalf of Pima County Interfaith Council (PCIC), which represents more than 25 congregations and community groups, we would like to express our concern regarding the issues of Tucson Electric Company's (TEP) proposal to radically change its net metering rates. We are very opposed to TEP's proposal to penalize new rooftop solar installations, especially without having the type and quality of scrutiny which comes from a rate case proceeding.

TEP currently relays heavily on fossil fuel plants that are located hundreds of miles from Tucson. Pollution from TEP's coal plants, and others, causes serious health effects and releases millions of pounds of carbon dioxide, which is a potent greenhouse gas. Many TEP customers, including our members, do not wish to purchase energy that has harmful effects. As you may be aware, many of our congregations and groups have installed fairly large renewable energy systems on our houses of worship and have encouraged, by example, many residential installations. For the reasons above, we believe TEP should continue to encourage rooftop solar and support local clean energy jobs.

Instead, TEP has proposed a penalty for rooftop solar that will undercut Arizona's solar economy. In its proposal to the Arizona Corporation Commission (ACC), TEP would take energy produced by new solar rooftop customers, and pay them less than 6 cents per kilowatt-hour, while selling it to other customers for about 13 cents. Additionally, new rooftop solar customers would no longer have the ability to "bank" the excess energy produced when their usage is low and use it when the usage is high. We believe that this proposal would act to prohibit working-class families from owning their own solar systems.

We understand that TEP argues that ratepayers who install solar are not paying their share of fixed costs; such as construction of power plants, transmission lines and associated costs. However, TEP's argument completely ignores a large portion of the benefits that solar customers provide to the grid and to the community. These include using less water, causing less pollution,



Pima County Interfaith Civic Education Organization

PIMA COUNTY INTERFAITH COUNCIL
Faith • Power • Action • Fé • Poder • Acción

and lessening the need for additional power plants. We believe these benefits should be considered since they reflect important values to our communities of faith and all those seeking stewardship for the Gift of Creation.

Furthermore, Arizona has some of the best opportunities for solar application in the country. We are already experiencing the negative impact of global climate disruption. The poor and the marginalized are especially feeling this environmental degradation. We believe that there needs to be a moral transformation in our connection to Earth's ecosystems. Encouraging adoption of solar is one way to help this transformation

As an immediate step, we suggest that the ACC tell TEP that this issue must, at a minimum, wait until it can be fully reviewed in a rate case. We encourage the ACC to reject TEP's proposal to penalize rooftop solar customers.

Moreover, we feel this matter should be a part of a generic rulemaking proceeding regarding net metering, so there is a consistent statewide approach. The current net metering rules were adopted in this manner. The proposals to change net metering tariffs from all Arizona utility companies should be similarly handled together. The Commission should establish a reasonable hearing schedule and determine if current net metering rules should be modified.

Thank you for considering our comments.

For The Green Economy Team of the Pima County Interfaith Council

Hank Kryzik, AIA

Our Mother of Sorrows Catholic Church

Alice Weekley

St. Francis in the Foothills UMC